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10 **UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA**

12 AMERICAN CIVIL LIBERTIES  
13 UNION FOUNDATION OF  
14 SOUTHERN CALIFORNIA,  
*Plaintiff,*

15 v.  
16 UNITED STATES IMMIGRATION  
17 AND CUSTOMS ENFORCEMENT,  
et al.,

18 *Defendants.*

19 Case No. 2:22-CV-04760-SHK

20 **DECLARATION OF KYLE  
VIRGIEN IN SUPPORT OF  
PLAINTIFF'S MOTION TO  
ENFORCE JULY 8, 2024 ORDER  
ON MOTION FOR SUMMARY  
JUDGMENT (ECF NO. 87)**

21 Honorable Shashi H. Kewalramani  
United States Magistrate Judge

22 Hearing Date: June 18, 2025  
23 Time: 10:00 a.m.

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27  
28 *ACLU of Southern California v. U.S. ICE, et al.,*  
Case No. 2:22-CV-04760-SHK

VIRGIEN DECLARATION ISO MOTION TO ENFORCE SUMMARY JUDGMENT ORDER

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27  
28 *ACLU of Southern California v. U.S. ICE, et al.*,  
Case No. 2:22-CV-04760-SHK

VIRGIEN DECLARATION ISO MOTION TO ENFORCE SUMMARY JUDGMENT ORDER

1 I, Kyle Virgien, declare as follows:

2       1. I am counsel for Plaintiff ACLU Foundation of Southern California in  
3 the above-captioned matter. I submit this declaration in support of Plaintiff's  
4 Motion to Enforce July 8, 2024 Order on Motion for Summary Judgment (ECF No.  
5 87). I have personal knowledge of the facts set forth below, and if called as a  
6 witness, I could and would competently testify thereto.

7       2. On December 11, 2024, Joseph Tursi, defense counsel in this case,  
8 sent a letter to my co-counsel Laboni A. Hoq, CCing the Court (by chambers  
9 email), my co-counsel Eunice Cho and Eva Bitran, and me. Attached hereto as  
10 Exhibit A is a true and correct copy of that letter.

11       3. Attached hereto as Exhibit B is a true and correct copy of a document  
12 produced by CRCL on February 21, 2025, in response to Plaintiff's FOIA request.  
13 This document, marked with Bates numbers 24-CRLI-00005-000073-81, is an  
14 email dated August 16, 2021, and titled "CRCL Investigation at the Adelanto ICE  
15 Processing Center."

17 I declare under penalty of perjury under the laws of the United States of America  
18 that the foregoing is true and correct.

20 | Executed on May 30, 2025, at Kensington, California

# Kyle Virgien